



September 10, 2024

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VIA ECF

Hon. Sidney Stein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

**RE: *The Center for Investigative Reporting, Inc. v. OpenAI Inc., et al.* No. 24-cv-04872 –
Extension Request**

Dear Judge Stein:

I represent Plaintiff The Center for Investigative Reporting, Inc. (“CIR”) in this matter. On September 3, 2024, Defendants moved to dismiss CIR’s Complaint. Pursuant to Fed. R. Civ. P. 15(a)(1)(B), CIR intends to file an Amended Complaint on September 24, 2024. I write to respectfully request an adjustment of the schedule following the filing of the Amended Complaint to accommodate counsel’s unusually high workloads. By operation of the Federal and Local Rules, the current deadlines are as follows:

- Amended Complaint: September 24, 2024
- October 8, 2024: Defendants’ answers or motions to dismiss amended complaint
- October 22, 2024 (if Defendants move to dismiss): Plaintiffs’ responses to motions to dismiss
- October 29, 2024: Defendants’ replies in support of motions to dismiss

CIR respectfully requests that Court adjust the schedule to the following:

- Amended Complaint: September 24, 2024
- October 15, 2024: Defendants’ answers or motions to dismiss amended complaint
- November 5, 2024 (if Defendants move to dismiss): Plaintiffs’ responses to motions to dismiss
- November 19, 2024 (if Defendants move to dismiss): Defendants’ replies in support of motions to dismiss



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This is the first request for an extension of these deadlines. Counsel for the parties have conferred, and Defendants consent to this motion.

Thank you for your consideration.

Respectfully submitted,

/s/ Stephen Stich Match

Stephen Stich Match (No. 5567854)

LOEVY & LOEVY

Counsel for Plaintiff

cc: All counsel of record (via ECF)

